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November 1, 2004

Mr. John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Mr. David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Re: Enhanced 911 Status Report

Dear Messrs. Muleta and Solomon:

Verizon Wireless hereby submits its quarterly status report documenting the progress of its efforts to deploy Enhanced 911 ("E911") capabilities, as required by the Commission's *Order* granting Verizon Wireless a waiver from certain Phase II E911 obligations.[1] There have been no additional deployment benchmarks that Verizon Wireless was required to meet since its last quarterly report. Should you need additional information, please contact the undersigned.

Sincerely,

John T. Scott, III

John T. Scott, III

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[1] *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Request for Waiver by Verizon Wireless, CC Docket No. 94-102 (*"Order"*), 16 FCC Rcd. 18634 (2001).

E911 Status - Quarterly Report

SUMMARY

Verizon Wireless has successfully implemented extensive network components, purchased modified handsets, and completed a complex series of tasks associated with providing enhanced 911 Phase I and Phase II location services to the public. Verizon Wireless' efforts to deploy enhanced 911 location services are summarized as follows:

- Verizon Wireless can support E911 Phase II service requests in markets supported by all three of its switch vendors.
  - Verizon Wireless met its milestones for completing deployment of the network-assisted portion of AGPS/AFLT in Lucent and Nortel markets by April 1, 2002 and August 1, 2002 respectively.
  - Verizon Wireless completed deployment of the network-assisted portion of AGPS/AFLT in its Motorola markets by March 1, 2003.
  - As of October 15, 2004, and since its last report, Verizon Wireless has deployed Phase I service to another 52 PSAPs. Verizon Wireless now provides Phase I E911 service to a total of 2,790 PSAPs serving an estimated population of 181 million residents in parts or all of 45 States.
  - Verizon Wireless has also deployed Phase II service to an additional 183 PSAPs since its last report. VZW now provides Phase II E911 service to 1,468 PSAPs serving an estimated population of 127 million residents in parts or all of 38 states.
  - Verizon Wireless has also deployed an interim EFLT solution in its Lucent and Nortel-switched markets that is activated commensurate with the activation of Phase II E911 AGPS/AFLT service to individual PSAPs.
- As of December 31, 2003 all of the handset models Verizon Wireless sells are GPS-capable of transmitting location.

I. HANDSET DEPLOYMENT

The *Order* required Verizon Wireless to begin selling and activating AGPS/AFLT capable handsets no later than December 31, 2001. Verizon Wireless met that requirement and other handset benchmarks:

- The *Order* established certain handset sales and activation milestones, requiring that at least 25% of all new handsets sold and activated between July 31, 2002 and March 30, 2003 were to be AGPS/AFLT capable. Verizon Wireless met that requirement; 34% of its new handsets activated during that period were AGPS/AFLT capable.

- The *Order* required that at least 50% of all new handsets sold and activated between March 31, 2003 and December 30, 2003 were to be AGPS/AFLT capable. Verizon Wireless met the 50% deployment milestone; 78% of its new handsets activated during the period were AGPS/AFLT capable.

- The *Order* required that beginning December 31, 2003, 100% of all new handsets sold and activated were to be AGPS/AFLT capable. Starting November 2001, Verizon Wireless required the AGPS/AFLT capability in all new handset models it ordered from manufacturers. As a result, by December 31, 2003, 100% of all the new handsets Verizon Wireless offered for sale via its direct distribution channels (company-owned stores and personnel, telemarketing and web-based sales channels) were AGPS/AFLT-capable.

- Verizon Wireless also instituted multiple requirements and procedures intended to ensure that its indirect distribution channels (those authorized agents and retailers who purchase and sell their own handsets and activate service on Verizon Wireless' behalf) offered only GPS-capable handsets by December 31, 2003.

- All of Verizon Wireless' handsets are GPS-capable: Samsung models, SCH-A530, SCH-A610, SCH-A650, SCH-A670, SCH-A790, SCH I600 and SPH-I700; Audiovox models CDM8600, CDM8900, CDM8910, and CDM9900; LG models VX3200, VX3200PPD, VX4500, VX6000, VX6100, and VX7000; Motorola models C343, V60p, and V710; Kyocera models KWC 7135, K404, KX414 and KX 414PPD; RIM Blackberry 6750 and 7750; Nokia model 3589i; 6015i and TREO 600 and TREO 600WOC. Verizon Wireless will continue to supplement its product line with additional GPS capable phones throughout 2004.

II. PHASE I & II PSAP DEPLOYMENT STATUS CHARTS

As part of this status update regarding Verizon Wireless' Phase II compliance efforts, the FCC requested information regarding all pending Phase I and Phase II

requests. The FCC required carriers to utilize a uniform reporting format for listing pending and completed deployments in place of individual, carrier developed report formats. The attached charts provide the status of the progress of Phase I and Phase II requests as of October 15, 2004.

Below is a summary of Verizon Wireless's deployment activities:

- Verizon Wireless deployed Phase I service to another 52 PSAPs since its last Quarterly Report. As of October 15, 2004 Verizon Wireless provides Phase I E911 service to a total of 2,790 PSAPs serving an estimated population of 181 million residents. Verizon Wireless provides live Phase I E911 service to PSAPs in parts or all of 45 states: AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NV, NY, OH, OR, PA, RI, SC, SD, TN, TX, VA, VT, WA, WI, WV, and WY.

- Verizon Wireless also deployed Phase II E911 service to an additional 183 PSAPs since its last report. VZW now provides Phase II E911 service to a total of 1,468 PSAPs serving an estimated population of 127 million residents. Verizon Wireless provides live Phase II E911 service to PSAPs in parts or all of 38 states: AL, CA, CO, CT, DC, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, MI, MN, MO, MS, MT, NC, ND, NH, NV, NY, OH, OR, PA, RI, SC, SD, TN, TX, VA, VT, WA, WI and WV.

DECLARATION OF ANTHONY J. MELONE

I have read the foregoing E911 Quarterly Status Report. I declare under penalty of perjury that the foregoing is true and correct. Executed on October 26th, 2004.

Anthony J. Melone
Vice President
Network Operations Support
Verizon Wireless

Certificate of Service

I hereby certify that on this 1st day of November 2004 copies of the foregoing E911 Quarterly Status Report in CC Docket 94-102 were sent by first-class mail to the following parties:

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